
From: Ken Lederman <ken.lederman@foster.com>
Sent: Wednesday, May 20, 2020 9:17 AM
To: Leefers, Kristin
Cc: Ken Lederman
Subject: RE: draft settlement agreement - EPA and SR
Attachments: 53734155-v3-Settlement Agreement - SRC Review Draft - May 2020.DOCX

Kris – thanks for the additional time. Attached is a redline comment draft from SRC regarding the proposed draft settlement agreement. We have no comments to Appendix A or B – SRC has reviewed and confirmed that the information contained in those documents is true and accurate. Separately, I have asked SRC to confirm whether there are any current liens or encumbrances on the property – I don't believe there are, but we will provide written confirmation shortly.

Ken Lederman

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From: Leefers, Kristin [mailto:Leefers.Kristin@epa.gov]
Sent: Tuesday, May 05, 2020 5:01 PM
To: Ken Lederman
Subject: draft settlement agreement - EPA and SR

Good Afternoon Ken,

Attached is a draft settlement agreement (SA_SR_v1) to address Spokane Recycling's liability at the Former Kaiser Smelter Site. There are a few comments throughout the document to help explain EPA's thinking or to flag areas for specific input. Please also be sure to review Appendix A. I believe it is a complete list of financial documents provided by your client to EPA for purposes of an Ability to Pay claim, but please confirm. Additionally, EPA will need a list of any current liens/encumbrances on the property, so I ask that your client provide such list. Details about the purpose of that list are contained in the settlement language.

If you have any questions as you are reviewing, please feel free to reach out to me. EPA requests that you provide comments no later than May 18, preferably using tracked changes in the word document for any proposed language edits. If you are unable to respond on behalf of SR by or before that date, please let me know.

Sincerely,
Kris

Kris Leefers
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